

# EXHIBIT A

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**Cc:** [Steve Berman](#); [Ben Siegel](#); [Emilee Sisco](#); [Meredith Simons](#); [Jen Parsigian](#); [Adam Dale](#); [Viebrock, Sarah](#)  
**Subject:** RFP Supplement  
**Date:** Friday, October 20, 2023 5:05:48 PM  
**Attachments:** [2021-11-05 \[175\] Stipulation and Order Extending Case Deadlines.pdf](#)



Counsel,

During Tuesday's U.S. Senate Judiciary Committee Hearing, Trinity Thomas testified that she participated in an "SEC Day on the Hill." This is one of many recent examples of efforts by Defendants to correspond with Congress regarding issues including college athlete compensation.

Plaintiffs previously served two Requests for Production that have become highly relevant in recent months and were not covered within the last time period of production. Plaintiffs seek supplemental productions of relevant documents that are responsive to the following Requests for Production:

REQUEST FOR PRODUCTION NO. 23:

All Documents Relating to any Communications, correspondence with and/or inquiries from the U.S. Senate, U.S. House of Representatives, members of Congress, and/or Congressional Committees and/or Subcommittees, or any state legislative bodies, along with any written responses to requests for information from such bodies, individuals, or committees regarding college athletes' rights in the licensing, sale, use, display or monetization of their names, images and/or likenesses.

REQUEST FOR PRODUCTION NO. 73:

All Communications with Charlie Baker Relating to college athlete compensation and/or NCAA rules Regarding college athlete compensation.

Defendants have an ongoing obligation to supplement, and the attached Stipulation and Order contemplates supplemental production of discrete categories of documents in order to address circumstances like this one. *See* Stipulation and Order Extending Case Deadlines, at ¶ 4, *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW, ECF No. 175. The recent Congressional hearings and testimony and Defendants' public push for new legislation makes any recently created documents highly relevant, and also not covered by previous productions. To streamline discussions, Plaintiffs are specifically targeting documents and communications between Defendants and Congress related to "Days on the Hill," new legislation, and documents specifically given to Congress by NCAA Staff and President Charlie Baker from March 1, 2023 to the present.

Plaintiffs are available to meet and confer early next week, if necessary, regarding this production.

Best,

Stephanie

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